
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 16-27657
Kathy S Grogan)	Chapter 13
Debtor(s).)	Judge: Pamela S. Hollis

NOTICE OF MOTION

TO: Kathy S Grogan, 2139 Wilson Creek Circle Aurora, IL 60503 *via US mail*

Glenn Stearns, Chapter 13 Trustee, 801 Warrenville Rd. Suite 650, Lisle, IL 60532 *via ECF clerk's electronic delivery system*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

Notice address for JPMorgan Chase Bank, NA: JPMorgan Chase Bank, NA. Chase Records Center Attn: Correspondence Mail, Mail Code LA4-5555 700 Kansas Lane Monroe, LA 71203 *via US mail*

Attorneys for JPMorgan Chase Bank, NA: Peter C Bastianen, Codilis & Associates, PC, 15W030 N Frontage Rd., Suite 100 Burr Ridge, IL 60527 *via US mail*
See attached service list

PLEASE TAKE NOTICE that on **September 6, 2019 at 10:45 a.m.**, I shall appear before the Honorable Judge Pamela S. Hollis at Joliet City Hall, 150 West Jefferson Street, 2nd Floor Joliet, Illinois 60432 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on August 16, 2019 before the hour of 7:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Kathy S Grogan, (hereafter referred to as “the Debtor”), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on August 29, 2016 and her Plan was confirmed.
3. The Debtor’s confirmation Order provides for a plan payment of \$1,135 for 60 months with unsecured creditors receiving 41% of their unsecured claims.
4. Paragraph E.5 of the confirmed plan provides for payments to JPMorgan Chase Bank, NA. for pre-petition arrears in the amount of \$12,946.28.
5. The Debtor had entered into a loan modification with JPMorgan Chase Bank, NA. on or around September, 2017, and the loan modification included pre-petition arrears as of the loan modification.
6. Since the pre-petition arrears as of the loan modification are being covered in the loan modification and JPMorgan Chase Bank, NA. returned funds sent to them from the Trustee’s office that a loan modification has been completed on the account, the Debtor is

requesting that the Trustee should not make any further disbursements to JPMorgan Chase Bank, NA.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation by directing the Trustee to not make any further disbursements to JPMorgan Chase Bank, NA.; and for such further relief that this Court may deem just and proper.

Dated: August 16, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
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